

COMMENTS OF GRAHAM BROCK, INC.
RM No. 11136
AMENDMENT OF SECTION §73.21, §73.37
AM EXPANDED BAND LIMITATIONS
February 2005

These comments are submitted by Graham Brock, Inc., Broadcast Technical Consultants, in response to the proposed rulemaking petition filed by Intermart Broadcasting of Georgia, Inc., Rama Communications, Inc., and Multicultural Radio Broadcasting, Inc., in RM No. 11136. This rulemaking petition seeks the amendment of §73.21 and §73.37 of the Commission's rules for stations operating in the Expanded AM Band (1605 kHz -1750 kHz).

The rulemaking petition proposes to assign Class B power and allocation limitations to the Expanded Band frequencies. Presently, the Expanded Band frequencies are assigned and allotted by spacing separations, with all facilities improvements in the Expanded Band requiring waivers of the Commission's rules (§73.21 and §73.37).

Contour protection criteria along with the use of directional antennas and power limitations of 50.0 kilowatts day and night for the expanded band frequencies has been proposed in the rulemaking petition. Contour protection and power increases, where appropriate, would allow Expanded Band frequencies to operate under the same rules as the remainder of the AM band (530 kHz - 1600 kHz).

Therefore, Graham Brock, Inc., supports the designation of certain of those stations operating in the AM Expanded Band (1605-1750 kHz) as Class B stations and to permit the authorization of such stations to operate with up to 50 kilowatts and allow the use of directional antennas by such stations, as allowed in §73.21 and §73.37 for the remainder of the stations in the AM band.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

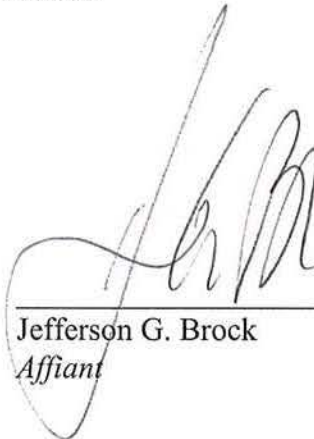
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has prepared the attached Comments.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 4th day of February, 2005.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 4th day of February, 2005*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007